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Attorneys for Plaintiff Angela Torres

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ANGELA TORRES, an individual,

Plaintiff,

vs.

**ALIREZA ZAMANIZADEH, a/k/a ALI
ZAMANI**, an individual; and **ADULT CARE
SEARCH**, a foreign non-profit corporation,

Defendants.

Case No. 3:17-cv-01270-AC

Clark County Superior Court,
Case No. 17-2-00426-3

**DECLARATION OF DAVID
RICHARDSON IN SUPPORT
RESPONSE TO DEFENDANT'S
MOTION TO COMPEL**

I, David Richardson, declare as follows:

1. I am one of the attorneys for the Plaintiff in this matter. I previously acted as lead counsel on her behalf, though Nicholas J. Henderson now serves in that role. I make this Declaration based on personal knowledge and public records. I am competent to testify.

2. I was retained by the Plaintiff in February 2017 to assist her in recovering real property located in Washougal, Washington and over \$300,000 in retirement and personal funds from the Defendants.

3. After being retained by Plaintiff, I submitted a complaint to the Oregon Department of Justice Charitable Activities Section on her behalf. The complaint related to Defendant Adult Care Search, which is a foreign nonprofit corporation.

4. Adult Care Search provided documents to the Oregon Department of Justice in connection with their investigation. On or about April 17th, 2017 the Oregon Department of Justice forwarded a handful of organizational documents but would not release their investigative file.

5. At no time have any discovery documents been provided to me directly by either Defendant.

6. On or about December 21, 2017, Defendants' prior counsel Timothy Calderbank issued Requests for Production of Documents and Interrogatories. On January 25, 2018, Mr. Calderbank filed a Notice of Attorney Withdrawal. *See* Dkt. 17.

7. On or about February 20, 2018, I issued responses to Defendants' discovery requests on Plaintiff's behalf and mailed them to Defendants at their address of 613 SW Elderbrook, Portland, OR 97225. I also provided 84 pages of documents with the discovery responses.

8. On March 16, 2018, I mailed an additional 150 pages to Defendants at their address of 613 SW Elderbrook, Portland, OR 97225.

9. On March 15, 2019, Nicholas J. Henderson and the law firm of Motschenbacher & Blattner LLP associated as additional counsel for the Plaintiff. Mr. Henderson and his law firm were the first to issue discovery requests to the Defendants in this matter. Since they issued discovery responses in and around April of 2019, no documents have been produced by or received from Defendants.

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I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 3rd day of September 2021.


David Richardson

CERTIFICATE OF SERVICE

I hereby certify that on the date shown below I served the foregoing **DECLARATION OF DAVID RICHARDSON IN SUPPORT OF RESPONSE TO DEFENDANT'S MOTION TO COMPEL** on the following person(s):

Alireza Zamanizadeh or
Ali Zamani
613 Elderbrook Place
Portland, Oregon, 97225
Email: ali0719@icloud.com

Adult Care Search
c/o Ali Zamani
613 Elderbrook Place
Portland, Oregon 97225
Email: ali0719@icloud.com

[X] by **mailing** a copy thereof in a sealed, first-class, postage prepaid envelope, addressed to the last known addresses of the above party, and depositing in the U. S. mail at Portland, Oregon on the date set forth below.

[X] by **emailing** a copy thereof to the attorney and his/her last known email address on the date set forth above.

DATED: September 3, 2021

/s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB # 074027
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